

June 1, 2017

Mr. Patrick Webre
Chief
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Skills-Based Routing and Deaf Interpreter Trials, CG Dockets No. 10-51 and 03-123

Dear Mr. Webre:

Sorenson Communications, LLC ("Sorenson") hereby conditionally elects to participate in the upcoming **skills-based routing** and **Deaf Interpreter** trials ("Trials") ("DI"). Sorenson Communications is excited about the opportunity to participate in these Trials and evaluate ways to improve the invaluable services provided through VRS.

This election is conditioned upon the following:

- 1) A review of the VRS rates that the Commission adopts for Fund Year 2017-2018 (July 1, 2017 to June 30, 2018). We are hopeful that the Commission will adopt rates sufficient to sustain functionally equivalent VRS and continue technological and service improvements. Once the FCC sets VRS rates for the 2017-2018 year, Sorenson will notify the Commission within 60 days whether Sorenson will continue to participate in the Trials.
- 2) Receiving additional time to commence the Trials, such as 180 days from the setting of 2017-2018 rates, to ensure sufficient time to implement operational and process changes. The Trials will require significant IT adjustments, and the development and implementation of new interpreting processes. Accordingly, we do not think it will be feasible to commence the Trials until late 2017 or early 2018. Ensuring that we have completed the necessary operational changes before starting the Trials is driven by our desire to make the skills-based routing and Deaf Interpreter experiences as seamless as possible for customers. Moreover, we want to avoid operational issues or difficulties, which may occur if there is not sufficient time to prepare, as such difficulties could negatively influence the customer experience.
- 3) Flexibility in determining how long Sorenson will participate in the Trials. Sorenson is committed to ensuring that the Trials produce sufficient data for trial evaluations. At the same time, Sorenson will incur additional costs to participate in the Trials. As such, we want to have the flexibility to balance the extent of our financial investment with the important need to produce enough data for effective evaluation. At this point, we hope that Sorenson's participation in the Trials will be between three and six months.

- 4) Upfront clarification on how “success” will be evaluated across all participants in the trials to ensure it is done in an objective and timely manner so that we can prepare at the outset for any data requests and reasonably anticipate post-Trial transitions or launches.

We are also committed to working with the Commission, VRS providers, and consumer groups to help better define what is being tested and how it can be effectively evaluated.

Standards for Interpreter Qualification

As per the stipulations in the March 23, 2017 *Report and Order* (FCC 17-26), we outline standards we are using to determine interpreter qualifications for skills-based routing and standards used to qualify a Deaf Interpreter. For the Deaf Interpreter trial we will also outline standards we plan to deploy in determining when and if a DI is used.

A. Skills-Based Routing

Sorenson Communications plans on participating in all three skills: medical, legal, and technical. Video Interpreters (“VIs”) will not be required to participate in any of the skills-based routing trials. They will be asked to opt in or opt out at their discretion.

Medical

To qualify currently employed VIs to participate in the VRS medical interpreting skills-based routing trial, Sorenson will use the following criteria to identify the appropriate participating VIs:

1. Be a current employee at Sorenson Video Relay Services.
2. Have 3+ years of experience as a Generalist VI.
3. Have documented experience interpreting in medical settings.
4. Have completed or taken medical interpreting instruction training provided by outside organizations or from Sorenson VRS.
5. Possess appropriate license or certification if applicable in the jurisdiction in which they work.
6. Elect to work on this subject matter and in this call queue.
7. Be subject to pre-qualification testing or training to assess aptitude for this skills-based routing work.
8. Be willing and able to take additional medical training throughout the trial, approximately 20+ hours.
9. Be able to work a minimum of 15 hours per week in the medical VRS system.

We believe that the trial will allow Sorenson to determine what skills are necessary to work as a VI in a VRS medical setting, as well as the necessary supplemental training and support we will need to give the VIs in order to handle medical calls. At present, we are recommending that all VIs who participate in the medical skills-based routing trial have an additional 20-30 hours of medical training. This supplemental training will be delivered to the VIs throughout the trial in order to provide functional equivalent interpretation for calls. The topics that need to be taught

and mastered include, for example: medical terminology, HIPAA training, addiction and recovery terminology, sexual abuse and support, physical exams, routine doctor's office visits, general health and nutrition information, childbirth, and physical therapy. These criteria would be subject to refinement as further experience is gained.

Legal

To qualify Sorenson employee VIs to participate in the VRS legal skills-based routing trial, Sorenson will use the following criteria to identify and qualify Video Interpreters in the legal skills-based routing call queue.

1. 5+ years work experience as a Video Interpreter in a VRS setting.
2. Legal interpreting experience outside of VRS of at least 5 years.
3. Documented legal training as an interpreter from various trainings available across the field of at least 20 hours every 4 years. This can include offerings from a school of higher education, college courses and or degrees, as well as legal continuing education offerings.
4. If a VI holds a credential in legal interpreting from RID, BEI, or from a state interpreting body, and/or is listed as a secondary legal interpreter that can work outside the court system, that will be strongly indicative, but not conclusive, of qualification to participate in the VRS legal skills-based routing trial.¹
5. Regardless of the credential possessed, which for the purposes of this trial is not being required, the VI participating in the legal portion of the trial will need to take Sorenson-provided VRS legal interpreting pre-training (this 16 hour training will incorporate standards already recognized and developed by the NCIEC and adopted for a VRS setting, along with other subset trainings that will include legal terminology and procedure, ethical decision making, working with a Deaf interpreter, working in a VRS setting, etc.).
6. Throughout the trial we will provide additional trainings and support that will be created or delivered based on the outcomes of reviews and needs assessments from the trial participants.

Technical

The criteria for choosing the standards for which a VI can handle the types of calls and content for legal and medical are more clear-cut than for the technical support queue. The technical support skills are more generalized, and the trial will give us the necessary experience to better ascertain what the correct skills are to handle such calls. Generally speaking, the foundational standards Sorenson will employ to choose a VI to work in the technical support queue will be as follows:

1. Worked as a VRS VI no less than 3 years.
2. Experience as a practicing sign language interpreter no less than 5 years.
3. Be a VI at SVRS in good standing with no disciplinary actions.
4. Completion of a baseline VI training to work in technical subject matter (3 hours as a prerequisite; i.e., Tools for Depiction: ASL Classifiers, Interpreting Technology Terms in VRS, ASL Expansion for Meaning Equivalence, etc.).
5. Sorenson will provide instructor-led follow-up training throughout the trial to focus on subject matter and call content that is technical in nature.
6. Sorenson will provide specialized training for interpreters to better support the Vis to work in the emerging technical fields including businesses and services owned and operated by Deaf consumers. This will support the efforts to provide a functional equivalent match for the VRS consumers that interact within the technical industry. The VIs will be expected to take 10 hours of training delivered in a blended learning curriculum throughout the trial.

¹ As of this date, there are only a limited number of interpreters with an RID credential for legal interpreting. To ensure a sufficient pool of interpreters, RID credential cannot be a mandatory criterion. It is also not feasible for VRS interpreters, who can be located anywhere in the United States or in interpreting centers in Canada, to be held to specific state law requirements for legal interpreting. It is not feasible for Sorenson (or any other VRS provider) to set up specific queues for each state and to direct calls only to interpreters meeting that state's requirements.

B. Deaf Interpreting

1. Interpreter Standards.

Sorenson will use the following criteria to begin using DIs in VRS calls. These criteria have been determined by Sorenson as a starting place to begin the trial and are subject to refinement. These criteria are not necessarily comprehensive, nor are they what we expect to be the final criteria. At this time, there is no existing research proving certain backgrounds or qualifications are required of the DI to work in a VRS environment.

1. 3+ years of experience working as a DI in the community at large.
2. Following the local/state law requirements of a practicing sign language interpreter, the DI will possess the appropriate license or certification credentials in order to be considered for work in a VRS setting.
3. High School Diploma or equivalent.
4. Documented 40 hours of Deaf Interpreter training at minimum.
5. Foundational Interpreting Pre Training of 16 hours.

6. Once the DI is hired by Sorenson, they will be required to take 18 hours of required training that will establish a baseline for understanding of the VRS environment, FCC regulatory compliance to the duties of a VI, and the details of navigating the VRS software and call processes specific to Sorenson.
7. Once hired, the DI will be required to take 16-20 hours of Effective Team and Call Management training alongside the non-Deaf VIs with whom they will be processing calls.

Sorenson already employs some Deaf Interpreters, many of whom already possess a national credential of being an RID Certified Deaf Interpreter (CDI), and will be utilizing this existing pool of Deaf Interpreters. We will also use other DIs who do not have the CDI credential but are recognized as a professional Deaf Interpreter working in various venues acknowledged by the Deaf community and who have salient work experience and/or may possess other interpreting credentials administered by state Deaf Commissions.

Throughout the trial, Sorenson will be providing supported trainings and skill set development following the NCIEC Deaf Interpreter Curriculum with modification made to the curriculum that better support working in a VRS environment.

2. Standards for Deploying a DI on a Call.

There is no better standard to determine the use of a Deaf Interpreter for a VRS call than the VRS User determining themselves that one is needed. For the purposes of the trial we will use a few standards to determine if and when a DI is needed for a VRS call.

1. Requested by the Deaf customer.
2. The traditional Video Interpreter determines, while in a VRS call, that the call will be better suited if a DI were added to the call in order to meet the language/linguistic needs of the caller.
3. If requested by the hearing user when placing a VRS call into the system. It is conceivable that a hearing party will know from previous experience that a DI is needed in order to have a successful call with the Deaf person they are calling.

The trial will allow for the flexibility over the Trial period to have different scenarios unfold in order to test the application of a DI in a VRS call.

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Please contact me if you have any questions.

Sincerely,



Scott Wood
General Counsel